

REMARKS/ARGUMENTS

The Final Office Action of November 9, 2005, has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claim 5 has been amended. Claims 2-18 and 21 remain pending.

Claims 2-5, 9-18, and 21 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,772,139 to Smith, III et al. (hereinafter referred to as "*Smith*"). Applicants respectfully traverse this rejection. The Action alleges that *Smith* shows all the elements of claims 2-5, 9-18, and 21.

Applicants' claim 21 recites, among other features, "wherein the link relates a spot in a document page with an executable object." To describe this feature, the Action maintains its previous rejection in the non-final Office Action mailed June 3, 2005, citing col. 5, lines 27-34 of *Smith*, relying on the ability to navigate to a target web page when clicking on a link. However, the Summary section of Applicants' original written description describes the difference between an executable object and navigation. Specifically, page 3, lines 10-14 states:

A link can relate a spot or region in a document with a spot or region in another document, so that touching the link causes the display to navigate to that other document. A link can also relate a spot or region in a document and an active runnable object such that when a user activates that link or touches that spot in the document, the associated object is run. (emphasis added)

Smith describes a link that navigates to another web page. The Action even states such indicating, "clicking the mouse on the underlined text, the visitor 'navigates' to the Web page shown in Fig. 2..." (Action, page 3). Navigation is not an executable object. *Smith* fails to teach or suggest Applicants' feature, "wherein the link relates a spot in a document page with an executable object." Thus, claim 21 is patentably distinguishable from *Smith* for at least the above stated reasons. As such, withdrawal of the rejection is respectfully requested.

Applicants' independent claim 2 recites, among other features, "wherein the display format of the link is based upon an examination of the content of a target document associated with the link." In rejecting this feature, the Action points to col. 4, lines 17-20 and col. 9, lines 1-12 of *Smith*. For the convenience of review, the cited passages are provided below:

Link properties can be specified by users to control the automatic installation of links and/or to control what is displayed while browsing the link databases. (Col. 4, lines 17-20)

While browsing, links and/or entire context subtrees can be marked for inclusion or exclusion in subsequent automatic link installations;

it provides a convenient means for navigating to contexts in which subcontexts and/or key-phrases can be added and/or edited by the user, or to key-phrases directories in which links can be added and/or edited and/or rated; and

by displaying links selectively according various link properties, browsing provides a means for viewing useful link subsets, such as all links entered by the user or user's group. (Col. 9, lines 1-12)

Inspection of the cited passages reveals nothing remotely related to a display format of a link being **based upon an examination of the content of a target document associated with the link**. At best, the cited portion of *Smith* describes how links or context subtrees may be marked for inclusion/exclusion in automatic link installations, means for navigating to contexts, and displaying links based upon link subsets, such as all links entered by a user. The cited portion fails to teach or suggest that the display format is based upon an examination of the content of a target document associated with the link. Thus, *Smith* is wholly devoid of a teaching or suggestion of the claim 2 combination of features. Applicants' claim 2 is patentably distinct over *Smith* for similar reasons as described above with reference to Applicants' claim 21 and further in view of the additional reasons herein.

To show the claim 3 feature that the link has a property indicating the display update latency of the link, the Action relies on the same support for rejecting claim 21 and points to col. 27, lines 32-42 of *Smith*. Again, for the convenience of review, the cited portion of *Smith* is included below:

If there are any pre-existing links in the same context directory with the same name and URL as a newly submitted link, the pre-existing link is retained unless the new submission is by the same owner. (Link properties could be updated or added in this manner, for example. Ratings and reviews are not affected since they may not be submitted in a dictionary file.) Rejected submissions are listed in a message from the server delivered in a dynamic web page, as is typical. Similar action is taken for other kinds of messages to the user as needed. (Col. 27, lines 32-42)

Inspection of the cited passage reveals nothing remotely related to a link having a property indicating the display update latency of the link. The Action responds to Applicants' argument by citing the above portion of *Smith* and stating, "Smith teaches a link having a property indicating the display update latency of the link." (Action, page 10). Applicants disagree entirely with this statement. Neither the cited portion of *Smith* nor any other portion explicitly teaches this feature of Applicants' claim 3. The Action reads *Smith* onto this claim 3 feature without any teaching or even suggestion. Should a teaching explicitly or implicitly exist in *Smith*, Applicants request the specific identification of where the display update latency of the link is disclosed or suggested in the *Smith* reference. *Smith* is wholly devoid of a teaching or suggestion of, "wherein the link has a property indicating the display update latency of the link." As such, Applicants' claim 3 is patentably distinct over *Smith* for similar reasons as described above with reference to Applicants' claim 21 and further in view of the additional reasons herein.

Applicants' claim 4 recites, among other features,

in response to activation of a second link by a user, the second link being different than the first link and linking to the same document page linked to by the first link, navigating to the linked-to document page and displaying the document page in a second display format, the second display format being different than the first display format.

To show this feature, the Action relies on col. 3, lines 18-27 and col. 4, lines 9-20 of *Smith*. Contrary to the Action's assertion however, *Smith* neither teaches nor suggests these features.

At best, *Smith* describes how a link-target URL may point to another Web page or it may simply point to another location within the same electronic document. *Smith* describes the general navigation among various pages of an electronic document; however, neither the cited portion, nor any other portion of *Smith*, teaches or suggest the same document page. Claim 4 recites linking to the same document page and displaying the document page in a second display format. *Smith* fails to teach or suggest two links to the same document page. As such, for at least the above-stated reasons, withdrawal of the rejection is respectfully requested.

Applicants' claim 5 has been amended to include a similar feature as recited in Applicants' independent claim 2. Thus, no additional search is needed. Applicants' amended claim 5 recite, among other features, "wherein the display format is based upon an examination

of the content of a target document page associated with the at least one of the first and second links.” This feature of Applicants’ claim 5 is similar to a feature described above with reference to Applicants’ claim 2. Therefore, for similar features recited above with respect to Applicants’ claim 2, claim 5 is patentably distinct over the art of record for substantially the same reasons and further in view of the novel features recited therein.

Applicants’ claims 9-18, which depend from claim 5, are patentably distinct over the art of record for at least the same reasons as their base claim and further in view of the novel features recited therein. For example, the cited portions of *Smith* fail to teach or suggest, “using heuristics to automatically provide most-likely-to-use links to additional material,” as recited in Applicants’ claim 9, “providing at least one of the most-likely-to-use links based upon documents created by an author who is the same as an author of a document being viewed by the user,” as recited in Applicants’ claim 12, and “providing at least one of the most-likely-to-use links based upon documents created during a first time period substantially the same as a time period during which a document being viewed by the user was created,” as recited in Applicants’ claim 13.

Claims 6-8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Smith* in view of U.S. Patent No. 6,151,622 to Fraenkel et al. (hereinafter referred to as “*Fraenkel*”). Applicants respectfully traverse this rejection.

Fraenkel fails to overcome the deficiencies noted above with respect to claim 5. As such, Applicants’ claims 6-8 are patentably distinct over the art of record for at least the same reasons as their ultimate base claim and further in view of the novel features recited therein. For example, Applicants have inspected the cited passage of *Fraenkel* applied to show the added feature recited in claim 6 of “displaying, in a display frame associated with a link in a linked-from document page, information about a linked-to document page.” The cited portion describes a browser window 200 sub-divided into three frames 201-203 associated with different URLs, where clicking on a link in one frame has no affect on the other two frames. (*Fraenkel*, col. 3, lines 48-63 and Fig. 2). For this further reason, even assuming, but not admitting, that the combination of *Smith* and *Fraenkel* is proper, the combination does not result in the claim 6 invention.

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CONCLUSION

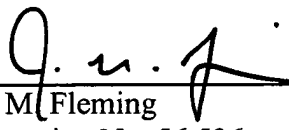
If any additional fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same.

Respectfully submitted,
BANNER & WITCOFF, LTD.

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